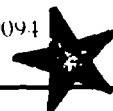


U.S. Scrap  
Chicago, IL

000048



Suite 1501, Northbrook Office Court  
666 West Dundee Road, Northbrook, IL 60062 • (312) 498-9094



TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION  
EPA CONTRACT 68-01-6669

Mr. Briand Wu, Deputy Project Officer  
Emergency Response Section  
Western Response Unit  
U.S. Environmental Protection Agency  
11th Floor  
230 South Dearborn Street  
Chicago, Illinois 60604

September 4, 1986

TAT-05-F-01001

Re: U.S. Scrap OSC Outline/Project Closure  
TDD# 5-8508-14 (FY 85)  
TDD# 5-8510-68 (FY 86)

Dear Mr. Wu:

On August 16, 1985, the U.S. Environmental Protection Agency (U.S. EPA) tasked the Technical Assistance Team (TAT) to respond to a hazardous waste landfill fire at the U.S. Scrap site in Chicago, Illinois. The response directive requested the TAT to monitor air quality, provide on-site technical support and document daily expenditures. The TAT was also tasked to prepare a comprehensive site assessment complete with extinguishment strategies, develop an Emergency Action Plan (EAP) to address alleged buried wastes, characterize site conditions and assemble an On-Scene Coordinator's (OSC) outline.

The August 16th response primarily focused on air quality characterization and technical support. The TAT's on-site monitoring of toxic fumes employed an organic vapor analyzer (OVA), colorimetric Draeger tubes, Gilian air pumps fitted with charcoal sample tubes, HNU photoionization detector and monitox units.

The TAT's technical support during the landfill fire response included the submission of a detailed report containing extinguishment recommendations and monitoring strategies. This report was submitted August 21, 1985. The TAT monitored the installation of the clay cap used to extinguish the fire, documented contractor performance, and maintained CERCLA paper work. The TAT also observed the aerial delineation of the extent of the underground fire utilizing infrared photometry and subsurface temperature probes. These monitoring activities continued until November 13, 1985, when ambient temperatures were determined to be static.

EPA Region 5 Records Ctr.



247130

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Inc., Jacobs Engineering Group Inc., C.C. Johnson & Associates, Inc., and Tetra Tech, Inc.,

Concurrent with the extinguishment operations, the TAT conducted an extensive historical investigation to identify past operational practices. This investigation prompted the second emergency removal action, upon receipt of allegations that a complex array of mixed waste streams had been burned within the railroad embankment. On September 2, 1985, the U.S. EPA requested a geophysical survey to confirm the alleged disposal practices. The TAT completed the survey within 72 hours and confirmed the railroad embankment to contain numerous buried drums. Consequently, the U.S. EPA requested the TAT to prepare an EAP to remove alleged shock-sensitive, bioradiological and chemically toxic waste streams. The TAT's EAP was submitted on September 19, 1985, and defined a strategy to remove, monitor and stage the mixed waste in a fashion such that a safe removal action was ensured.

On September 5, 1985, the OSC requested a detailed sampling plan be prepared. The plan was to include a variety of sampling and monitoring programs that would provide the necessary data to adequately assess the site. Additionally, cost estimates were prepared for each sample program. This report was submitted in late September 1985. The railroad embankment emergency removal action was initiated on October 7, 1985, and continued until November 8, 1985, when all drums had been exhumed.

Following the removal action, transportation and disposal arrangements were to be procured through PEI Associates, Inc., the prime Emergency Response Contract Systems (ERCS) contractor. On November 11, 1985, the U.S. EPA tasked the TAT to conduct a follow-up geophysical survey to assure all drums had been removed from the embankment. The TAT completed this task on November 18, 1985, and submitted a draft report on November 25, 1985 with the final report submitted on June 3, 1986. The TAT report concluded that all buried drums had been removed from the railroad embankment. However, the report also noted significant volumes of buried materials were present east of the railroad embankment.

All exhumed wastes were staged on site while waiting for receipt of disposal analysis data. Due to the lack of regulatory compliance by the several disposal facilities contacted, as well as other problems encountered by PEI Associates, the TAT was subsequently requested to assume disposal arrangements in April of 1986. To this end, disposal of all staged wastes was completed on July 25, 1986. Complete documentation of site activities was summarized by the TAT and submitted in an OSC's outline on May 9, 1986. This May 9th

Mr. Briand Wu

-3-

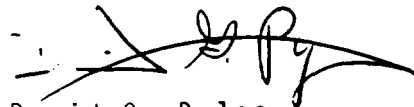
September 4, 1986

submittal was under interim status, pending the completion of the transportation and disposal activities. Therefore, submitted herewith is the final OSC outline, inclusive of Section 2.2.6, Waste Disposal. In addition to this section, Tables 1 and 2 have been prepared to summarize final expenditures and identify waste materials removed.

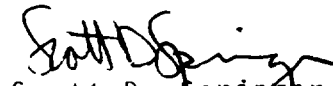
This letter serves to close out TDD# 5-8510-68. If you have any questions or comments, please feel free to call upon us.

Very truly yours,

ROY F. WESTON, INC.



David G. Pyles  
Project Geologist



Scott D. Springer  
Technical Assistance Team  
Leader, Region V

DGP:amp

TABLE 1  
SUMMARY OF CLEANUP COSTS AT  
U.S. SCRAP. CHICAGO, ILLINOIS

<u>Organization</u>	<u>Cost</u>
PEI Associates (ERCS)	\$534,338.13
<u>Intramural</u>	
U.S. EPA Region V <sup>1/</sup>	16,000.00
U.S. EPA ERT <sup>1/</sup>	22,821.00
U.S. EPA Las Vegas <sup>1/</sup>	18,000.00
Technical Assistance Team as of 7-25-86	92,877.39
Special Projects (TAT) as of 7-25-86	<u>8,304.00</u>
Total Cost	\$692,340.52

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<sup>1/</sup>Cost incurred as of November 20, 1985.

TABLE 2

U.S. SCRAP SITE  
CHICAGO, ILLINOISSUMMARY TABLE OF MATERIALS REMOVED TO  
CHEMICAL WASTE MANAGEMENT, EMELLE, ALABAMA, FACILITY

<u>Date</u>	<u>Material Shipped</u>	<u>Volume</u>
7-17-86	Crushed drums and debris	40 yds
7-17-86	Soils	40 yds
7-24-86	Soils	20 yds
7-25-86	Soils	60 yds
7-25-86	Crushed drums and debris	20 yds
7-25-86	Hazardous waste solid, nos NA9189	(35) 85-gal drums
7-25-86	PCB UN2315	(1) 85-gal drum
7-25-86	Flammable solid, nos UN1325 (CN)	(3) 85-gal drums
7-25-86	Hazardous waste solid, nos NA9189	(38) 85-gal drums
7-25-86	Flammable solid nos UN1325	(1) 85-gal drum

OSC REPORT OUTLINE

FOR

U.S. SCRAP REMOVAL ACTION  
CHICAGO, ILLINOIS

Prepared For:

U.S. Environmental Protection Agency  
Region V  
230 S. Dearborn Street  
Chicago, Illinois

CONTRACT NO. 68-95-0017

TAT-05-F-00779

TDD# 5-8508-14 (FY 1985)

TDD# 5-8510-68 (FY 1986)

Prepared by:

WESTON-SPER  
Technical Assistance Team  
Region V

May 1986

## 1.0 BACKGROUND

### 1.1 Location

- A. The U.S. Scrap site is located at latitude 41° 40' 30" and longitude 87° 36' 39". The legal address is believed to be 12300 S. Cottage Grove, Chicago, Illinois (Figure 1).
- B. The immediate area around the facility is industrial; however, there are residential areas located approximately one-half mile to the west and one mile to both the north and south of the site.
- C. The Little Calumet River flows east approximately 1.5 miles south of the site into Lake Calumet and Lake Michigan 1.5 miles and 5 miles, respectively, northeast of the site.
- D. The site covers approximately nine acres.
- E. The site is bordered:
  - 1. To the north by Keywell Industries (metal scrap facility);
  - 2. To the east by Keywell Industries and the Metropolitan Sanitary District (MSD) sewage treatment plant;
  - 3. To the south by the MSD plant; and
  - 4. To the west by the embankment of the Chicago and Western Indiana Railroad.
- F. Site Geology consists of:
  - 1. 10-15 feet of surface fill material; and
  - 2. Niagaran dolomite of the Silurian system overlain by approximately 65 feet of silty-clayey glacial till.

### 1.2 Initial Situation

- A. From the late 1960s to 1975, Mr. Steve Martell conducted drum reclamation activities at the U.S. Scrap site. Nonreclaimable drums and wastes from reclaimable drums were emptied into on-site pits. Waste received at U.S. Scrap for on-site

incineration was allegedly dumped on site. Prior to these activities by Mr. Martell, a malting plant operated on the site.

- B. During its period of operation as a waste disposal facility, the site was inspected by officers of the MSD and the City of Chicago's Environmental Control Division. The MSD's concern over run-off from the U.S. Scrap site entering adjacent MSD property resulted in a cooperative agreement to improve drainage at the U.S. Scrap site. The cooperative agreement involved the Illinois Attorney General (IAG), the Illinois Environmental Protection Agency (IEPA), the City of Chicago, and Mr. Martell.
- C. Inspection of the U.S. Scrap site in 1980 by the IEPA revealed:
  - 1. Approximately 400 55-gallon drums of waste scattered about the surface of the site;
  - 2. Liquid wastes stored in eight concrete silos;
  - 3. Scattered surficial deposits of waste;
  - 4. Several lagoons of waste; and
  - 5. Sludge within on-site drainage swales.
- D. Under an agreement with the U.S. Environmental Protection Agency (U.S. EPA), IEPA, and the City of Chicago, Mr. Martell removed the surface drums, the liquids within the silos, and approximately 10,000 gallons of sludge from the drainage swales.
- E. The IAG filed suit against Mr. Martell in 1980, citing him for illegal open dumping and refuse disposal without a permit. The suit restricted further waste disposal at the site, and requested Mr. Martell to remove the wastes described in Section 1.2(C, D) of this report. The IAG also requested that Mr. Martell take appropriate remedial actions to manage the wastes buried at the site, but this had not resulted in responsible party corrective action. In 1981, the IAG contracted STS Consultants to conduct an extent-of-contamination survey.
- F. The abandoned site was brought to the attention of the U.S. EPA on August 16, 1985, when MSD officials reported a landfill fire on the site. Due to the potential threats to human health and the



environment posed by the site (Section 1.3), the U.S. EPA responded to the fire and subsequently initiated a removal action. The removal action ultimately addressed both the landfill fire and buried waste on site.

### 1.3 Threats to Human Health and the Environment

- A. The landfill fire produced a threat of inhalation of volatile organic gases and various gaseous combustion products (documented by air monitoring during the fire--Section 2.1(E)(3)). Left unattended, the landfill fire could have intensified and emitted higher volumes and concentrations of organic gases, thus increasing the inhalation threat. There was also a threat of explosion of wastes ignited by the fire. These threats to the workers (on adjacent properties) and residents near the site demanded the extinguishment of the landfill fire.
- B. Observation of drums protruding from the embankment along the railroad tracks on the western border of the site (Figure 2) and information from a past U.S. Scrap operator, identified a significant threat to human health and the environment. The estimated 300-400 drums allegedly contained:
  - 1. Pesticides;
  - 2. Shock-sensitive and other lab-packed, hospital wastes including:
    - a. radiated biological research wastes;
    - b. radioactive scintillation cocktails;
    - c. blood specimens; and
    - d. tissue samples.
- C. There is a large volume of containerized and noncontainerized hazardous waste buried in the central landfill areas of the site which pose a threat to human health and the environment. Since these wastes are buried at depths estimated up to 40 feet, the landfilled material did not present an immediate threat and, therefore, was not addressed in the removal action. Surface and subsurface soil sampling by the TAT and previously by the IEPA on site revealed contamination with organics (including PCBs).
- D. Threats from the drums buried in the embankment included:

1. Fire/explosion of shock-sensitive waste in the embankment;
2. Direct contact with toxic chemical, biological, and radioactive materials contaminating the soil presently, or as the result of potential leaks and/or explosion of drums in the embankment;
3. Inhalation of volatile organic gas from the potential disturbance of the buried drums in the embankment; and
4. Bioaccumulation of polychlorinated biphenyls in organisms exposed to the contaminated material.

## 2.0 SUMMARY OF EVENTS: FEDERAL CLEANUP ACTION

- A. The cleanup was conducted by Zone 3 Emergency Response Cleanup Services (ERCS) contractor, PEI Associates, Inc.
- B. The contract was awarded to O.H. Materials Services of Findlay, Ohio, and Mid-America Environment Service of Riverdale, Illinois.
- C. An initial allocation of \$\_\_\_\_\_ was granted by \_\_\_\_\_ for the response to the landfill fire. An additional allocation of \$\_\_\_\_\_ was granted for the excavation, sampling, and disposal of drums in the railroad embankment to raise the final project ceiling to \$\_\_\_\_\_.
- D. Each of the following subsections corresponds to the 10 major phases of the removal action. The phases are presented on a time-line (Appendix A) that illustrates the sequence of tasks and when they were initiated and completed.

### 2.1 Response to Landfill Fire

- A. MSD reports smoke from U.S. Scrap landfill to the IEPA on August 14, 1985.
- B. IEPA responds to the landfill fire. After initial reconnaissance of the site, the U.S. EPA is called for assistance.
- C. On-Scene Coordinators (OSCs) Briand Wu and William Simes, TAT, representatives from Mid-America and O.H. Materials (ERCS contractors), IEPA, and the Chicago Fire Department (CFD) respond to the

landfill fire on August 16, 1985. Services of a consultant from Blow-Outs, Inc., specialists in underground and oil well fires, were procured by O.H. Materials.

D. The underground fire which initially existed at two locations at the site (central and southern, see Figure 3) was believed to have been ignited by a surface brush fire.

E. Landfill fire response activities included:

1. Application of a water-based foam to the landfill surface by the CFD to control burning; this measure was ineffective in smothering the underground fire;
2. Placement of a clay cap, between August 16 and September 9, 1985; on the landfill to control burning;
3. On-site air monitoring downwind of the landfill fire was performed by the Technical Assistance Team (TAT) with:
  - a. HNU photoelectric ionization detector (10-80 ppm relative to 60 ppm benzene);
  - b. OVA flame ionization detector;
  - c. Draeger tubes (positive identification: HCN, acetone, aniline,  $\text{CCl}_4$ , HCl, benzene, methylene chloride, mercaptan, ethyl benzene);
  - d. Gilian air pumps with charcoal tubes;
  - e. Oxygen meters (16%  $\text{O}_2$ ); and an
  - f. Explosimeter (6% LEL).
4. Off-site air monitoring at eight locations (Figure 4) to allay public concern in the surrounding neighborhoods was performed by Mid-America with:
  - a. HNU photoelectric ionization detector;
  - b. Draeger tubes (HNC, benzene);
  - c. Gilian air pumps with charcoal tubes; and,
  - d. Oxygen meters.

Monitoring from August 16 through September 1985, two to three times daily, indicated no off-site migration of airborne contaminants.

5. Surface soil samples collected by the TAT on August 17, 1985, at the north and south burn areas and the east boundary drainage ditch revealed contamination with organics, including PCB (up to 149 mg/kg, total).
6. Soil/gas sampling and on-site analysis with a portable gas chromatograph was conducted at 36 locations on the site by the U.S. EPA Emergency Response Team (U.S. EPA ERT) on September 4-5, 1985, to help identify the buried wastes.
7. Sub-surface temperature monitoring was conducted from September 10 through November 20, 1985, after the fire areas were capped. Digital temperature readings from probes located approximately three feet below the ground surface were used to monitor the intensity and horizontal migration of the underground fire. The subsurface temperature monitoring was terminated when the temperature readings remained at ambient levels for several weeks.
8. Aerial infra-red photometry was conducted between August 21 and December 3, 1985.
9. CFD water trucks were on stand-by for fire extinguishment during initial excavation activities.

## 2.2 Drum Excavation Along Railroad Embankment

### 2.2.1 Removal Planning

- A. Prior to the on-site removal actions concerning the buried drums in the embankment, the TAT developed:
  1. A comprehensive sampling/site characterization plan; and,
  2. An Emergency Action Plan (EAP) to address the drums allegedly buried in the railroad embankment (O.H. Materials developed a drum excavation plan also).
- B. The following removal activities were recommended to alleviate the threat from the alleged drums buried in the railroad embankment:

1. Site preparation, safety, and security;
2. Air monitoring;
3. Drum excavation;
4. Drum staging and sampling;
5. Rebuild railroad embankment; and,
6. Disposal of excavated wastes, including on-site crushing of unknown lab-pack bottles and on-site detonation of shock-sensitive waste.

#### 2.2.2 Site Preparation

- A. Office and decon trailer and other equipment were mobilized between August 28 and October 9, 1985.
- B. Security fence was installed around the perimeter of the site on August 30, 1985, to limit public access to the site, thus reducing the potential exposure to humans. The fence was paid for by Mr. Martell.
- C. Contingency and safety plans were established with mobilization of O.H. Materials work crew on October 8, 1985.
- D. Staging and radiation pad and crushing and detonation bunkers were constructed on site on October 14, 1985. A portable building was erected in the hot zone for lab-pack separation.
- E. The Chicago and Western Indiana Railroad Company was contacted to establish a communication system regarding site activities, especially during possible detonation of shock-sensitive waste.
- F. Two 10,000-gallon pools were constructed on site and filled with water to aid in extinguishing potential on-site fires during drum handling activities.

#### 2.2.3 Geophysical Survey I

- A. A geophysical survey was conducted prior to embankment excavation to locate areas of potential drum burial along the embankment.
- B. A transect line established near the top of the east side of the railroad embankment, with 10 foot intervals between markers.

- C. On August 31, 1985, TAT and Weston Geoscience Group conducted a geophysical survey on the established transect line using an electromagnetometer and a flux-gate magnetometer.
- D. The survey suggested that the entire length of the embankment had a high potential for buried ferromagnetic materials, most notably at the base of the embankment.

#### 2.2.4 Drum Excavation

- A. Fire breaks were excavated every 300 feet along the embankment to minimize possible chain-reaction fire/explosions.
- B. TAT performed on-site and off-site air monitoring with the HNU (twice a day), Gilian air pumps (daily) and high volume air samplers (twice during excavation and staging operations).
- C. U.S. EPA conducted a radiation survey along the embankment on October 17, 1985, which revealed no readings above the ambient range.
- D. Approximately 77 drums were excavated from the entire length of the embankment between October 16-20, 1985. The drums contained mercaptans and paint residues and resins; many of the drums were crushed and leaking.
- E. The embankment excavation did not expose the shock-sensitive and other hospital waste lab packs that were expected.
- F. After further discussions with the ex-operator from U.S. Scrap, it was estimated that approximately 10 feet of fill had been placed on the land adjacent to the embankment after the alleged drums were buried in the original base of the embankment.
- G. Several test pits were dug to a maximum of 18 feet below the present land surface down to the original base of the embankment. Water contaminated with organics and oil was encountered at 3 feet below the land surface, and the alleged lab-packs were not found. The pits were covered with clean fill and clay capped. The grossly contaminated soil from the pits was stored in lined roll-off boxes on site and will be disposed of after analysis.

#### 2.2.5 Drum Staging

- A. Drums removed from the embankment were sampled to determine chemical compatibility for bulking and disposal, overpacked, and staged on diked clay pads lined with visqueen.
- B. Severely leaking drums that were compatible (mostly paint wastes) were consolidated in a clay mixing pit and solidified with "oil dry." The mixture was then placed in overpack drums.

#### 2.2.6 Waste Disposal

- A. O.H. Materials work crew mobilized on July 17, 1986, to prepare and ship staged drums, soil roll-off boxes, and crushed drums off site to the Chemical Waste Management Landfill at Emelle, Alabama. The following activities were accomplished:
  - 1. Forty yards of crushed drums were loaded into two dumpsters and shipped to Emelle; and,
  - 2. Two of the six soil roll-off boxes were shipped to Emelle.
- B. Work crew is demobilized on July 17, 1986, and will return with additional equipment and materials to overpack the staged drums which were not ready for shipment.
- C. PEI Associates work crew mobilized on July 24, 1986, to overpack the staged drums and to continue shipping wastes to the Emelle, Alabama, landfill. On July 24 and 25, 1986, the following tasks were accomplished:
  - 1. Drums were overpacked;
  - 2. Seventy-eight 85-gallon overpacks were loaded into two semi-van trailers and shipped to Emelle;
  - 3. Twenty yards of crushed drums were loaded into one dumpster and shipped to Emelle; and,
  - 4. The four remaining soil roll-off boxes were shipped to Emelle.
- D. Work crews were demobilized on July 25, 1986. All wastes excavated during this removal action were shipped to CWM's Emelle, Alabama, facility.

- E. During the disposal activities, all trucks leaving the hot zone were decontaminated with a high pressure washer.

#### 2.2.7 Embankment Reconstruction

- A. The material removed from the embankment was returned to the embankment after the entire length had been excavated.
- B. Approximately 1,830 yards of clean fill was purchased and placed on the embankment on November 4-7, 1985, to replace the exhumed drums and other inert debris (e.g., concrete, steel rods) which were removed from the slope.

#### 2.2.8 Geophysical Survey II

- A. A second geophysical survey was conducted after the embankment was reconstructed to check for buried drums still remaining in the embankment or immediately east of the embankment.
- B. Three transect lines were established 15, 30, and 45 feet east of the original transect line, corresponding to the middle and base of the east side of the embankment. North/south stations were spaced at 10 foot intervals.
- C. On November 11, 1985, TAT conducted a geophysical survey on the transect lines described above using an electromagnetometer and a flux-gate magnetometer.

#### 2.2.9 Soil and Water Sampling

- A. Five soil samples were collected from the west side of the railroad embankment on October 3, 1985, to determine off-site surface contamination. Migration of contaminants was suspected through and beneath the embankment, as well as through a storm-water pipe, which apparently hydraulically connected the site with the marsh west of the embankment. The samples were analyzed for priority pollutants; all analytical results can be found in Appendix \_\_\_\_.
- B. Four samples were collected of the contaminated water in the test pit on October 22, 1985, for chemical characterization. Samples were also taken of the excavated soil from the test pits for disposal considerations. These test pit samples were taken to identify contaminants in the soil at depth (0-18 ft) and in the shallow (perched) ground water.



- C. Soil samples were collected of the freshly excavated embankment surface at 150 foot intervals on October 23-24, 1985, to determine the extent of contamination in the embankment. The samples were analyzed for priority pollutants.
- D. Five grab surface soil samples were collected at various locations in the hot zone on October 25, 1985, for pesticides analyses. This random sampling verified the absence of wide-spread surface pesticide contamination.
- E. Two grab surface soil samples were collected from near the incinerator in the hot zone on October 29, 1985, for dioxin analyses.
- F. Composite samples of water were collected in a 10 inch well located in the center of the site on November 12, 1985, at depths of 0-30 feet below land surface. These liquid samples were taken to identify contaminants in the water to help assess the nature of the buried wastes at the site.

#### 2.2.10 Air Monitoring

- A. Twice daily during the entire drum excavation project, HNU photoionization air monitoring for volatile organics was performed at 15 points on and off site. Monitoring points were based on the varying positions of site activities and on wind direction. HNU readings were generally 0-2 ppm (relative to 60 ppm benzene) above background (ambient) readings. During the test pit excavation, downwind readings were 10-16 ppm above background.
- B. Gilian air pumps (5-9) with charcoal tubes were used for eight hours per day during the entire drum excavation project. Pumps were placed on and off site based on the varying positions of site activities and on wind direction. The transect air sampling technique was implemented to determine the configuration of the pumps (Figure 5). The tubes were subject to an organic scan and consistently showed less than 1 ppm organics.
- C. High-volume air samplers were used on two days to sample for inorganics up- and downwind of the detonation/crushing bunkers and staging area. Analysis of the filters revealed no constituents significantly above ambient concentrations.

### 2.3 Other Federal, State and Local Activities

- A. In 1982, the U.S. Scrap site received a score of 1.92 using the Hazard Ranking System (HRS) for possible inclusion on the National Priority List. Surface water samples were the only samples utilized in this initial scoring. Air emissions were subsequently monitored in October 1985 with Gilian pumps fitted with charcoal tubes and by grab air bag samples. The air monitoring showed insignificant airborne contaminants resulting in an insignificant change in the HRS score.
- B. The U.S. EPA ERT performed a soil/gas survey at 36 locations on site following the landfill fire response activities to help identify the buried wastes.
- C. The U.S. EPA's Technical Support Division provided video tapes of on-site activities for the news media.
- D. The U.S. EPA's Air and Radiation Branch provided guidance and equipment for radioactive material identification and performed a radiation survey of the railroad embankment prior to excavation activities.
- E. The CFD responded to the landfill fire and subsequently participated in major portions of the contingency plan by providing standby fire protection.

### 2.4 Cost Summary

- A. O.H. Materials, Inc., and Mid-America Environment Services were the ERCS subcontractors and performed all removal activities.
- B. Site activity was initiated on August 16, 1985, and was completed December 10, 1985 (see Activity Log, Appendix A).
  - 1. Daily expenditures for services provided for under the ERCS contract totaled \$\_\_\_\_\_.
  - 2. In addition to the \$\_\_\_\_\_ incurred through contracted services, recoverable costs were also expended by the U.S. EPA, TAT, and Weston Geosciences Group. A summary of all recoverable costs incurred during the landfill fire response and drum excavation activity at the U.S. Scrap site are presented in Table 1.

## 2.5 Community Relations

- A. During the first two weeks of the landfill fire, the U.S. EPA's Office of Community Relations responded to media requests for information and met with local community groups.
- B. There was a press release for the site on October 7, 1985.
- C. A fact sheet was distributed on October 9, 1985, at a local community meeting. The fact sheet was updated on October 23 and November 26, 1985.
- D. Television interviews were given by the OSC on site on October 16, 1985. The OSC also briefed MSD officials and employees at the neighboring MSD facility on this day.
- E. Concerned community leaders met with U.S. EPA's Office of Public Affairs at the U.S. EPA office on October 22, 1985.
- F. Concerned community leaders were given perimeter site tours on October 31 and November 1, 1985.

## 3.0 PROBLEMS ENCOUNTERED

### 3.1 Location of Drums in the Embankment

Due to poor information received from the ex-operator at U.S. Scrap and a change in site topography, the drums allegedly buried in the embankment were not located during this removal action. They are now thought to be located below the present grade in the original base of the embankment. Such wastes do not pose an immediate threat and removing them was beyond the scope of this removal action.

### 3.2 On-Site Flooding

Site activities involving heavy equipment movement were slowed or halted by heavy rains and muddy conditions.

## 4.0 OSC'S RECOMMENDATIONS

1. COST CENTER:	<b>ACKNOWLEDGEMENT OF COMPLETION</b> <b>FOR TDD</b> <b>TAT EMERGENCY RESPONSE,</b> <b>REMOVAL AND PREVENTION</b>  <b>ROY F. WESTON INC.</b>	2. NO: <b>17-18-19-20</b>  <input checked="" type="checkbox"/> COMPLETE <input type="checkbox"/> INTERIM
3. RESPONSE: <p>Herewith please find the technical assistance  <del>and</del> <b>completed</b> outline and          cover letter for the TDD (Micro 10)          removal action</p>		<input type="checkbox"/> FORMAL REPORT <input type="checkbox"/> LETTER REPORT <input type="checkbox"/> FORMAL BRIEFING <input checked="" type="checkbox"/> OTHER (SPECIFY)  <b>OSC outline</b>
3A. COST TO DATE: \$                      DATE: <b>7-1-76</b>  3B. TOTAL COST TO CLOSURE: \$		3C. ACTUAL TOTAL HOURS:
4. DPO ACTION: <input type="checkbox"/> ACCEPTED <input type="checkbox"/> ACCEPTED WITH EXCEPTIONS <input type="checkbox"/> REJECTED		
5. COMMENTS:		
6. I CERTIFY THAT THE ATTACHED MATERIALS MEET AND COMPLY WITH ALL REQUIREMENTS OF THE SUBJECT TDD.		
6A. TATL SIGNATURE AND DATE CORRESPONDING TO 3B. ABOVE		6B. TATL SIGNATURE AND DATE CORRESPONDING TO 3B. ABOVE
7. I ACKNOWLEDGE THAT I HAVE BEEN PROVIDED WITH THE MATERIALS AND SERVICES SPECIFIED IN THE SUBJECT TDD WITHIN ITS ORIGINAL OR REVISED TIME FRAMES.		8. DATE:
(AUTHORIZING DPO SIGNATURE)		

Sheet 1 White - TATL Copy (With Final Costs, DPO Signature)  
 Sheet 2 Green - DPO Copy (With Final Costs, TATL Signature)  
 Sheet 3 Pink - NPMO Copy (With Final Costs and Signatures)  
 Sheet 4 Blue - PO Copy (With Final Costs and Signatures)  
 Sheet 5 Goldenrod - CO Copy (With Final Costs and Signatures)  
 Sheet 6 Canary - TATL Copy (With Final Costs, But No DPO Signature)  
 Sheet 7 Pink - DPO Copy (With Interim Costs, TATL Interim Signature)